

**IN THE UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

**IN RE: WILLIE JAMES LOTT, SR.,
DEBTOR**

**CASE NO. 20-21397
CHAPTER 13**

**RUSHMORE LOAN MANAGEMENT SERVICES,
LLC AS SERVICER FOR U.S. BANK TRUST
NATIONAL ASSOCIATION, NOT IN ITS
INDIVIDUAL CAPACITY BUT SOLELY AS
OWNER TRUSTEE FOR THE FOR LEGACY
MORTGAGE ASSET TRUST 2020-GS1**

MOVANT

VS.

**WILLIE JAMES LOTT, SR., Debtor;
and SYLVIA F. BROWN, Trustee**

RESPONDENTS

OBJECTION TO CONFIRMATION

Comes now Rushmore Loan Management Services, LLC as servicer for U.S. Bank National Association, not in its individual capacity but solely as owner trustee for Legacy Mortgage Asset Trust 2020-GS1, a secured creditor of the above named Debtor, and a party in these proceedings, (hereinafter "Movant"), by and through its attorneys, Wilson & Associates, P.L.L.C., and for its Objection to Confirmation of the Chapter 13 plan proposed herein by the Debtor, Willie James Lott, Sr., states:

1. Movant is the servicer of a promissory note, which is secured by a Deed of Trust covering the property, commonly known as 1777 Prado Avenue, Memphis, TN 38116.
2. Pursuant to 11 U.S.C. §1324, Movant objects to said Chapter 13 plan because the Debtor's plan does not list Movant as a creditor. The Proof of Claim to be filed lists arrearages of

\$1,487.61, pending approval. Therefore, the debtor's plan should be amended to provide for the arrearages and ongoing payments to be paid through the Trustee's office.

3. Therefore, the plan does not meet all of the requirements for confirmation.

WHEREFORE, Movant objects to confirmation of the Chapter 13 plan proposed herein by the Debtor, and prays that this Court deny such confirmation, for its attorney's fees herein and for all other just and proper relief.

Respectfully Submitted,

WILSON & ASSOCIATES, P.L.L.C.

/s/ Brent Heilig

Joel W. Giddens (016700)
Heather Martin-Herron (032248)
Alexandra Bradley (034703)
Kathryn Lachowsky-Khan (037090)
Luke H. Neder (028444)
Brent Heilig (023681)

5050 Poplar, Suite 1015
Memphis, TN 38157
(901) 578-9914

Attorneys for Movant

CERTIFICATE OF SERVICE

On 04/10/2020, a copy of the foregoing was served via electronic mail, upon:

William W. Newell
Attorney at Law
4466 Elvis Presley Blvd. Suite 310
Memphis, TN 38116

Sylvia F. Brown
Trustee
200 Jefferson Avenue Suite 1113
Memphis, TN 38103

and served via U.S. mail upon:

Willie James Lott, Sr
Debtor
18 E. Mitchell Road
Memphis, TN 38109

/s/ Brent Heilig

Joel W. Giddens (016700)
Heather Martin-Herron (032248)
Alexandra Bradley (034703)
Kathryn Lachowsky-Khan (037090)
Luke H. Neder (028444)
Brent Heilig (023681)

W&A. 323573